

I would like to comment in opposition to IBOC aka HD Radio being allowed on the AM broadcast band.

First, the sideband interference would cause immediate and severe interference to existing broadcasters. In many cases, especially after sunset, it would raise the non-interference contour of adjacent stations significantly. The NRSC mask is being improperly applied when claims to the contrary are being put forth. That mask was never intended for continuous data stream modulations.

Second, mandating a proprietary system with recurring license fees goes against prior history. The fact that one entity, and one entity only will benefit from these fees is wrong. It becomes a defacto monopoly. Any digital broadcast scheme should be open source with fully published specifications.

Third, it is a solution to a non-problem. There has been no consumer outcry whatsoever for a better means to listen to existing programming.

I have been a broadcast engineer for nearly 35 years. IBOC/HD Radio is a damaging technology which is ill-suited to coexist with analog transmission. Tests so far have concentrated on one IBOC station and one non-IBOC test subject. The aggregate effects of a band full of these digital carriers will cause interference far beyond what the proponents suggest.

I urge the Commission to reject nighttime permission of any IBOC/HD Radio transmissions pending a full review by an independant body.

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